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Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE GOOGLE PLAY DEVELOPER
 ANTITRUST LITIGATION

Case No. 3:20-cv-05792-JD

**DEVELOPER PLAINTIFFS’
 ADMINISTRATIVE MOTION TO SEAL
 PORTIONS OF PLAINTIFFS’ SECOND
 AMENDED CONSOLIDATED
 COMPLAINT**

Related Actions:
Epic Games, Inc. v. Google LLC,
 No. 3:20-cv-5671-JD
In re Google Play Consumer Antitrust
Litigation, No. 3:20-cv-5761-JD

TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Developer Plaintiffs will and hereby do move the Court, pursuant to Civil Local Rule 79-5, for an administrative order to file under seal portions of Developer Plaintiffs' Second Amended Consolidated Complaint ("Plaintiffs' Motion").

Plaintiffs file this motion in accordance with Civil Local Rule 79-5 and the Court's August 25, 2021 Order regarding the sealing of Plaintiffs' complaints in this multidistrict litigation (ECF No. 137) ("Order Re Sealing Of Complaints"). Pursuant to Civil Local Rules 79-5 and 7-11(c); no hearing date has been set.

Materials to Be Filed Under Seal

Plaintiffs file this administrative motion to comply with Civil Local Rule 79-5 and the Court's Order Re Sealing Of Complaints.

Portions of Developer Plaintiffs' Second Amended Consolidated Complaint contain, summarize, or reflect the content of a document Defendants have designated as Confidential and/or Highly Confidential pursuant to the protective order in this case ("the Protected Material"). As such, Defendants, as the designating parties, are responsible for establishing that all of the designated materials are sealable. By submitting these materials under seal, Plaintiffs do not concede that any of the materials satisfy the criteria for remaining under seal. Additionally, the Protected Material was the subject of a motion to seal made by Defendants on August 20, 2021 (ECF No. 135). That motion to seal was granted as to the Protected Material on August 25, 2021 (ECF No. 137).

Pursuant to Civil Local Rule 79-5(d)(1), the following attachments accompany this motion:

1. Declaration of Bonny E. Sweeney in Support of Developer Plaintiffs' Administrative Motion to Seal;
 2. A proposed order that identifies the document sought to be sealed;
 3. A redacted version of Developer Plaintiffs' Second Amended Consolidated Complaint;
- and

- 1 4. An unredacted version of Developer Plaintiffs' Second Amended Consolidated
2 Complaint.

3
4
5 DATED: December 3, 2021

Respectfully submitted,

6 By s/ Bonny E. Sweeney

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CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2021, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to all counsel of record registered in the CM/ECF system.

Dated: December 3, 2021

/s/ Bonny E. Sweeney
Bonny E. Sweeney